

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DR. MUHAMMAD MIRZA and ALLIED  
MEDICAL AND DIAGNOSTIC SERVICES,  
LLC,

*Plaintiffs,*

v.

JOHN DOE #1 a/k/a John D., a Yelp.com user,  
JOHN DOE #2 a/k/a Elizabeth M., a Yelp.com  
user, JOHN DOE #3 a/k/a Robert R. a Yelp.com  
user, JOHN DOE #4 a/k/a Zoe C., a Yelp.com  
user, JOHN DOE #5 a/k/a Caroline P., a  
Yelp.com user, JOHN DOE #6 a/k/a Yelena P.,  
a Yelp.com user, JOHN DOE #7 a/k/a Lana W.,  
a Yelp.com user, JOHN DOE #8 a/k/a Zin N., a  
Yelp.com user, JOHN DOE #9 a/k/a Carly D., a  
Yelp.com user,

*Defendants.*

Case No. 1:20-cv-09877-PGG-KNF

**DECLARATION OF**  
**DR. MUHAMMAD MIRZA IN**  
**SUPPORT OF PLAINTIFFS'**  
**MOTION FOR EXPEDITED**  
**DISCOVERY**

Muhammad Mirza declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am over 18 years of age and am a plaintiff herein.
2. I am the sole member and principal of Allied Medical and Diagnostic Services, LLC ("Allied Medical"). Allied Medical and I are the plaintiffs in the above-captioned proceeding. I submit this declaration in support of Plaintiffs' Motion for Expedited Discovery.
3. I have personal knowledge of all matters stated herein, or I am familiar with the facts and circumstances of the instant action based upon records and files maintained by myself of Allied Medical.
4. The persons making these posts are believed to be the defendants in the above-captioned action.

5. Upon information and belief, and according to their Yelp.com profiles, none of the Defendants are citizens of New Jersey.

6. All of the Defendants posted their comments on the Yelp pages that provide New York locations for my business.

7. On or about November 21, 2019, Defendant John Doe #1 a/k/a John D., a Yelp.com user with the username “John D.” directed the authoring of a harassing and defamatory user review of Plaintiffs on Yelp.com (accessible as to the public on the Internet at [https://www.yelp.com/biz/mirza-aesthetics-new-york-9?hrid=DGAHH0Lccny5Q6xdL25qaA&utm\\_campaign=www\\_review\\_share\\_popup&utm\\_medium=copy\\_link&utm\\_source=\(direct\)](https://www.yelp.com/biz/mirza-aesthetics-new-york-9?hrid=DGAHH0Lccny5Q6xdL25qaA&utm_campaign=www_review_share_popup&utm_medium=copy_link&utm_source=(direct))). This post is not true because I operate a legitimate business that does not operate scams and I do not purposely make offensive statements online to get attention or to harm someone else. I have never been diagnosed as autistic or with any mental health condition.

8. On or about December 26, 2019, Defendant John Doe #2 a/k/a Elizabeth M., a Yelp.com user with the username “Elizabeth M.” directed the authoring of a harassing and defamatory user review of Plaintiffs on Yelp.com (accessible as to the public on the Internet at [https://www.yelp.com/biz/mirza-aesthetics-new-york-6?hrid=GX-Eoln36Lr9RbgOBjfEfQ&utm\\_campaign=www\\_review\\_share\\_popup&utm\\_medium=copy\\_link&utm\\_source=\(direct\)](https://www.yelp.com/biz/mirza-aesthetics-new-york-6?hrid=GX-Eoln36Lr9RbgOBjfEfQ&utm_campaign=www_review_share_popup&utm_medium=copy_link&utm_source=(direct))). This post is not true because I operate a legitimate business and am a licensed medical professional. I have many years of experience in cosmetic treatments. I take measures to ensure a sanitary practice. My employees and I always act in a professional manner. I always ensure the correct product is used and the amount of product that is paid for. Further, I make sure a patient can ask any questions or express concerns before, during, and after the procedure. I only use authentic products.

9. On or about January 22, 2020, Defendant John Doe #3 a/k/a Robert R., a Yelp.com user, with the username “Robert R.” directed the authoring of a harassing and defamatory user review of Plaintiffs on Yelp.com (accessible as to the public on the Internet at [https://www.yelp.com/biz/mirza-aesthetics-new-york-9?hrid=N3xJVECus6h-oBxRHDQmzA&utm\\_campaign=www\\_review\\_share\\_popup&utm\\_medium=copy\\_link&utm\\_source=\(direct\)](https://www.yelp.com/biz/mirza-aesthetics-new-york-9?hrid=N3xJVECus6h-oBxRHDQmzA&utm_campaign=www_review_share_popup&utm_medium=copy_link&utm_source=(direct))). This post is not true because I operate a legitimate business and operate out of legitimate commercial space. I operate out of different commercial office spaces for the convenience of my patients. I take all measures to ensure a sanitary practice. I do not use fake Botox and always use authentic products. I follow temperature guidelines from the products’ companies and always have a refrigerator on site.

10. On or about February 28, 2020, Defendant John Doe #4 a/k/a Zoe C., a Yelp.com user, with the username “Zoe C.” directed the authoring of a harassing and defamatory user review of Plaintiffs on Yelp.com (accessible as to the public on the Internet at [https://www.yelp.com/biz/botox-juvederm-doctor-new-york?hrid=pDQvIc\\_0pZ4LGgU\\_vt8DA&utm\\_campaign=www\\_review\\_share\\_popup&utm\\_medium=copy\\_link&utm\\_source=\(direct\)](https://www.yelp.com/biz/botox-juvederm-doctor-new-york?hrid=pDQvIc_0pZ4LGgU_vt8DA&utm_campaign=www_review_share_popup&utm_medium=copy_link&utm_source=(direct))). This post is not true because I operate a legitimate business and am a licensed medical professional. I do not dilute the products used on patients, and Plaintiffs always inform my clients the price of their services before payment is due.

11. On or about March 20, 2020, Defendant John Doe #5 a/k/a Caroline P., a Yelp.com user, with the username “Caroline P.” directed the authoring of a harassing and defamatory user review of Plaintiffs on Yelp.com (accessible as to the public on the Internet at [https://www.yelp.com/biz/mirza-aesthetics-new-york-9?hrid=IZyk8iz4r8aNO6LXTXPINg&utm\\_campaign=www\\_review\\_share\\_popup&utm\\_medium=copy\\_link&utm\\_source=\(direct\)](https://www.yelp.com/biz/mirza-aesthetics-new-york-9?hrid=IZyk8iz4r8aNO6LXTXPINg&utm_campaign=www_review_share_popup&utm_medium=copy_link&utm_source=(direct))). This post is not true because I operate a legitimate business and am a licensed medical professional. I do not dilute the products used on patients, and Plaintiffs always inform my clients the price of their services before payment is due.

[m=copy\\_link&utm\\_source=\(direct\)\)](#). This post is not true because I operate a legitimate business and am a licensed medical professional.

12. On or about August 6, 2020, Defendant John Doe #6 a/k/a Yelena P., a Yelp.com user, with the username “Yelena P.” directed the authoring of a harassing and defamatory user review of Plaintiffs on Yelp.com (accessible as to the public on the Internet at

[https://www.yelp.com/biz/mirza-aesthetics-new-york-](https://www.yelp.com/biz/mirza-aesthetics-new-york-9?hrid=SJyIAEe7D5nwtjsC9PpQtg&utm_campaign=www_review_share_popup&utm_medium=copy_link&utm_source=(direct)))

[9?hrid=SJyIAEe7D5nwtjsC9PpQtg&utm\\_campaign=www\\_review\\_share\\_popup&utm\\_medium=copy\\_link&utm\\_source=\(direct\)\)](https://www.yelp.com/biz/mirza-aesthetics-new-york-9?hrid=SJyIAEe7D5nwtjsC9PpQtg&utm_campaign=www_review_share_popup&utm_medium=copy_link&utm_source=(direct))). This post is not true because I operate a legitimate business and am a licensed medical professional. I only use authentic products on my patients and do not

inject just “saline” and “air.” I don’t inject my patients with Windex.

13. On or about June 23, 2020, Defendant John Doe #7 a/k/a Lana W., a Yelp.com user, with the username “Lana W.” directed the authoring of a harassing and defamatory user review of Plaintiffs on Yelp.com (accessible as to the public on the Internet at

[https://www.yelp.com/biz/mirza-aesthetics-new-york-](https://www.yelp.com/biz/mirza-aesthetics-new-york-6?hrid=UgoMOrR0K5hGGux40RCjBQ&utm_campaign=www_review_share_popup&utm_medium=copy_link&utm_source=(direct)))

[6?hrid=UgoMOrR0K5hGGux40RCjBQ&utm\\_campaign=www\\_review\\_share\\_popup&utm\\_medium=copy\\_link&utm\\_source=\(direct\)\)](https://www.yelp.com/biz/mirza-aesthetics-new-york-6?hrid=UgoMOrR0K5hGGux40RCjBQ&utm_campaign=www_review_share_popup&utm_medium=copy_link&utm_source=(direct))). This post is not true because I operate a legitimate

business and am a licensed medical professional. I ensure that the practice engages in necessary procedures to ensure a sanitary practice. I do not use counterfeit products. I only use authentic products and I don’t dilute products purchased by the client. I do not intimate my patients to buy more products. I operate out of different commercial office spaces for the convenience of my patients. I have a primary office location that I can be reached at, along with an office phone number and email address.

14. On or about July 23, 2020, Defendant John Doe #8 a/k/a Zin N., a Yelp.com user, with the username “Zin N.” directed the authoring of a harassing and defamatory user review of

Plaintiffs on Yelp.com (accessible as to the public on the Internet at

[https://www.yelp.com/biz/mirza-aesthetics-new-york-](https://www.yelp.com/biz/mirza-aesthetics-new-york-9?hrid=q5bxT1zhRhKEZhTVIBsJJQ&utm_campaign=www_review_share_popup&utm_medium=copy_link&utm_source=(direct))

[9?hrid=q5bxT1zhRhKEZhTVIBsJJQ&utm\\_campaign=www\\_review\\_share\\_popup&utm\\_medium=copy](https://www.yelp.com/biz/mirza-aesthetics-new-york-9?hrid=q5bxT1zhRhKEZhTVIBsJJQ&utm_campaign=www_review_share_popup&utm_medium=copy_link&utm_source=(direct))

[link&utm\\_source=\(direct\)](https://www.yelp.com/biz/mirza-aesthetics-new-york-9?hrid=q5bxT1zhRhKEZhTVIBsJJQ&utm_campaign=www_review_share_popup&utm_medium=copy_link&utm_source=(direct))). This post is not true because I operate a legitimate business and am a licensed medical professional. I have never engaged in the practice of theft or embezzlement.

15. On or about August 20, 2020, Defendant John Doe #9 a/k/a Carly D., a Yelp.com user, with the username "Carly D." directed the authoring of a harassing and defamatory user review of Plaintiffs on Yelp.com (accessible as to the public on the Internet at

[https://www.yelp.com/biz/mirza-aesthetics-new-york-6?hrid=R-](https://www.yelp.com/biz/mirza-aesthetics-new-york-6?hrid=R-5xV81g48755lZxaODRMA&utm_campaign=www_review_share_popup&utm_medium=copy_1ink&utm_source=(direct))


[5xV81g48755lZxaODRMA&utm\\_campaign=www\\_review\\_share\\_popup&utm\\_medium=copy\\_1](https://www.yelp.com/biz/mirza-aesthetics-new-york-6?hrid=R-5xV81g48755lZxaODRMA&utm_campaign=www_review_share_popup&utm_medium=copy_1ink&utm_source=(direct))

[ink&utm\\_source=\(direct\)](https://www.yelp.com/biz/mirza-aesthetics-new-york-6?hrid=R-5xV81g48755lZxaODRMA&utm_campaign=www_review_share_popup&utm_medium=copy_1ink&utm_source=(direct))). This post is not true because I operate a legitimate business and am a licensed medical professional. I inject each of my patients with the full amount of product that they paid for. I do not price gouge. I do not water down the fillers I inject and do not engage in fraudulent practices.

16. I have read a copy of the Complaint herein prior to its filing and know the contents thereof; the same is true to my own knowledge, except to statements therein stated to be alleged on information and belief, and as to those matters, I believe to be true.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed on February 16, 2021.

  
Muhammad Mirza